Blanco Farms, LLC

1/19/19

Dr. Jean-Pierre Wolff, Chair
Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, Ca 93401

Dear Dr. Wolff,

We are a farming company affiliated with the Nunes family of companies that grow and ship a full line of conventional and organic vegetables on the Central Coast. Within region 3 we farm from the Forebay area of the Salinas valley all the way to the coast, in the Pressure area. Our geographic footprint gives us a wide view of farming practices here in the Salinas valley. We farm both conventional and organic vegetables in this area.

We pride ourselves on being conservative in nature and progressive in practice. Our farming company has devoted a great amount of time to the science of farming. Through science combined with old fashioned hard work we developed a farming system that was ahead of its time with respect to Nitrogen management. Our lettuce fertilizer budget for applied and managed conventional fertilizer applies less than the University of California crop uptake total and has done so for over a decade. We are confident that we get the balance of the necessary nitrogen from the soil reservoir, or the irrigation water, depending on location. Usage of these two alternate forms of N can improve the nitrogen groundwater contamination situation.

We feel the current Ag Order 4.0 renewal matrix proposed by staff is of concern to our operation in a variety of ways and we appreciate the ability to comment on it. With respect to the overall renewal, we favor a phasing in approach in all cases It seems logical to focus on the most impaired areas, or poorer operators first if the true goal is to improve all water quality (both surface and ground water). We also would like to ensure due process for the regulated stakeholders with the idea that anybody who should need to, would have a chance to tell their story. We will address each Table in order.

Table 1:

As proposed, the discharge limits are troublesome. Will the discharge limit be derived from an equation that consists of multiple crops for a given year? Will the determination allow for multi cropping at all? We do not see the table as written that way. It must be clear how this works in a multi crop system. We do not believe that the water board should engage in application limits, but rather regulate discharges. What we have found with our farming is that fertilization rates can be sustained at university guidelines,

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plus 10-20% for act of God situations and the simple fact that no agricultural system is 100% efficient. We would start there for the first timeline benchmark and later get to a situation like our conventional program where N is consumed from either the soil or groundwater. Once again, these are management factors and we feel that the water board should promote those guidelines via the authority to regulate *discharge* and not set application limits. Agronomically speaking, application limits will hurt organic agriculture more than conventional because organic agriculture thrives via nitrogen sequestration in the soil, something this table does not address.

Table 2:

We are not versed in the actual numeric limits for surface water discharges and where they should land based on science. We feel that Preservation Inc. of which we are a member can better express where those numbers should fall. We do believe as a general concept that progress on surface water will occur at the watershed level. We feel that the order should allow for an iterative process that allows growers time to adapt if an improvement has been recommended and implemented but does not work. We must remember that even the best current day science may not be as effective as tomorrow's solutions and any good order must allow for adaptation and implementation of best practices even if they don't simply "hit the number."

Table 3:

We generally agree with Option 1 and think it sounds reasonable on face value. Pesticide management with respect to surface water is easily our biggest challenge with water quality. We would like the RWQCB to address specifically organic pesticides and the general lack of data with respect to toxicity. Are organic pesticides an alternative to conventional pesticides with respect to water quality objectives? We would like to see this area studied in more detail and brought to the forefront of the discussion.

Table 4:

The sediment management issues we face are ranch specific. We have some ranches with berries under plastic mulch that have very little runoff, even in storm events, and others that are more challenging. We feel sediment management must be phased in. Simply put, in the Salinas valley one would want to focus efforts on the east side sub basin first, as there is obviously more erosion in that area of the valley. It is common sense. Requiring growers to create and implement a sediment and erosion control plan seems like a logical approach as it could be designed by a professional and used as a baseline onto which a ranch can be judged to show that it is making improvements. Also, if RWQCB staff were to inspect ranches and their plans, growers in the region will naturally spread the word about how inspections are going and what has been successful, and what their neighbors should be accomplishing. A third-party coalition would be helpful in this regard, serving as the conduit to spread the word to other members of the regulated public. Our operation will likely have to install sediment basins on three ranches, at a significant cost to us.

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Table 5:

The poor farm is caught in a vice on this issue. The FDA, CDC, LGMA, USDA and The Food Safety Modernization Act all call for shippers to not harvest possibly contaminated product. Everyone knows the contamination comes in part from the same wild life that live in the habitat this order attempts to restore and protect. Furthermore, our customers who buy our produce add even more buffer requirements on top of everything whether they are needed or not. The result is a reduction in available farm land, a dwindling resource. We would support and currently have no issues with the current setbacks. We understand change is necessary and think in Order 4.0 the focus should be on science-based setbacks primarily, and lesser consideration should be given to what kind of vegetation is used, ie. grasses vs shrubs vs trees. We feel the distance is where everyone can find common ground.

Thank you for the opportunity to comment. We are sorry we cannot get specific on every single detail, but the issue is of importance to us and we feel comments are necessary for all parties involved in the process. We encourage you to consider proposals put forth by agricultural groups as they are aligned with our point of view and they understand the difficulties we face as a farming company. We hope to see a new order that includes the overarching philosophies set forth in our comments, most importantly due process and phasing. Thanks again.

Sincerely,

Tim Borel

Production Manager

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